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September 20, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Wednesday, September 19, 2012, Lance Steinhart, John Nakahata, and Kasey Chow, on behalf of ConnectTo World, Inc. d/b/a ConnectToWireless ("ConnectToWireless" or the "Company"), as well as Aram Ter-Martirosyan, CIO of the Company, spoke with Kimberly Scardino, Divya Shenoy, Alexander Minard, David Bradford, and Michelle Schaefer of the Telecommunications Access Policy Division. We discussed ConnectToWireless' Compliance Plan as filed on September 5, 2012.

Aram Ter-Martirosyan gave an introduction and overview of the Company, including detail regarding the Company's financial capability, current operations, current service offerings to low-income consumers, and intentions and plans on entering the wireless market to serve underserved communities.

We discussed the Company's relationship with ConnectTo Communications, Inc. We discussed requested changes to the Company's certification form, marketing materials, terms and conditions and website. Finally, ConnectToWireless agreed to file a revised Compliance Plan with all suggested changes and additions.

Attached is a copy of the presentation deck that was provided at the meeting yesterday; the sample certification form and sample advertisement provided at the meeting were filed as Exhibits A and B, respectively, in the Company's compliance plan.

Ms. Marlene H. Dortch
September 20, 2012
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Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart
Attorney for ConnectTo World, Inc. d/b/a
ConnectToWireless

Attachment

cc: Aram Ter-Martirosyan
John Nakahata
Kimberly Scardino
Divya Shenoy
Alexander Minard
David Bradford
Michelle Schaefer

**ConnectTo World, Inc.
d/b/a
ConnectToWireless**



**Federal Communications
Commission
September 19, 2012**

Agenda

- Introduction to ConnectTo World, Inc.
- Financial & Technical Capability
- ConnectToWireless' Lifeline Plans
- Marketing/Advertising Plan
- Enrolling Lifeline Customers
- Recertifying Lifeline Customers
- Preventing Waste, Fraud & Abuse
- Q & A



ConnectToWireless

- Introduction to the Company
 - Incorporated in California on Dec. 30, 2009
 - Operates its wireless business as ConnectToWireless
 - Currently provides security monitoring, Satellite TV installation, IPTV, Internet, and VoIP
- Names and Identifiers used by the Company
 - ConnectTo World
 - ConnectToWireless



ConnectToWireless

- In compliance with newly amended section 54.202, ConnectToWireless certifies:
 - It will comply with the service requirements applicable to the support that it receives;
 - It has the ability to remain functional in emergency situations;
 - It will satisfy applicable consumer protection and service quality standards; and
 - It is financially and technically capable of providing the Lifeline service.



Financial Capability

- ConnectToWireless has the financial capability to provide the supported Lifeline service:
 - 3 years in operation
 - Currently operating in California



Technical Capability

- ConnectToWireless has the technical capability to provide the supported Lifeline service :
 - Key Management Experience
 - **Aram Nadjarian** – 17+ yrs in telecom
 - **Abraham Setanyan** – 17+ yrs in telecom
 - **Aram Ter-Martirosyan** – 16+ yrs in telecom



Lifeline Plans

- ConnectToWireless offers Lifeline discounts on its various retail plans:
 - Retail plans range from 250 minutes to unlimited minutes
- All Lifeline plans include:
 - Free handset or SIM card
 - Free calls to 911 Emergency Services
 - Free calls to Customer Service
 - Free Domestic Long Distance



Lifeline Plans

ConnectToWireless Plans	Minutes	Text (SMS)	Data	Retail Plan Price	Lifeline Plan Price
Wireless Connect **	250	0	0	\$9.25	\$0.00
Wireless Connect Plus *	300	0	0	\$11.75	\$2.50
Wireless Ultimate *	350	0	0	\$14.25	\$5.00
Wireless Ultimate Plus *	500	0	0	\$19.99	\$10.74
Wireless Supreme *	750	0	0	\$24.99	\$15.74
Wireless Supreme Text and Data	750	2000	100	\$34.99	\$25.74
Wireless Unlimited Voice and Text	unlimited	unlimited	0	\$44.99	\$35.74
Wireless Unlimited	unlimited	unlimited	500	\$59.99	\$50.74



Lifeline Plans

- Public Safety and 911 / E911 Access:
 - ConnectToWireless will ensure that all handsets used in connection with its Lifeline service are E911-compliant.
 - ConnectToWireless will provide its Lifeline customers with access to 911 and E911 services:
 - through its underlying carrier
 - at the time of Lifeline service initiation
 - regardless of activation status and minute availability



Marketing/Advertising Plan

- All materials will comply with disclosure requirements:
 - Disclose company name under which it does business;
 - Explain in clear, easily understood language the following:
 - ✓ Only eligible consumer may enroll in the program;
 - ✓ What documentation is necessary for enrollment;
 - ✓ The program is limited to one benefit per household, consisting of either wireline or wireless service;
 - ✓ Lifeline is a government benefit program; and
 - ✓ Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.



Marketing/Advertising Plan

- ConnectToWireless intends to market its Lifeline service via:

- Community Events
- TV / Radio spots
- Direct mail
- Flyers / Brochures
- Internet

- ConnectToWireless intends to market and provide Customer Service to the following communities:

- Armenian
- Russian

ConnectTo WIRELESS

**FREE WIRELESS PHONE!
PLANS STARTING FROM \$9.25 PER MONTH**

IN ADDITION LIFELINE QUALIFIED CUSTOMERS WILL GET \$9.25 DISCOUNT ON TOP OF ALL CONNECTTO WIRELESS DISCOUNT PLANS

250 minutes
\$0 monthly charge
for Lifeline qualified customers!

Postpaid & Prepaid				Postpaid Only Usage				ConnectTo Lifeline Plan Price
ConnectToWireless Plans	Minutes	Text (SMS)	Data (Internet)	Overage Minutes	Overage Text	Overage Data/Meg	ConnectTo Plan Price	
Wireless Connect **	250	0	0	\$0.20	\$0.20	\$0.40	\$9.25	\$0.00
Wireless Connect Plus *	300	0	0	\$0.20	\$0.20	\$0.40	\$11.75	\$1.50
Wireless Ultimate *	350	0	0	\$0.20	\$0.20	\$0.40	\$14.25	\$1.00
Wireless Ultimate Plus *	500	0	0	\$0.10	\$0.10	\$0.20	\$19.99	\$10.74
Wireless Supreme *	750	0	0	\$0.10	\$0.10	\$0.20	\$24.99	\$11.74
Wireless Supreme Text and Data	750	2000	100	\$0.10	\$0.10	\$0.20	\$34.99	\$25.74
Wireless Unlimited Voice and Text	2000	2000	0	\$0.00	\$0.00	\$0.10	\$44.99	\$35.74
Wireless Unlimited	2000	2000	500	\$0.00	\$0.00	\$0.05	\$59.99	\$50.74

* Can use Combo Voice or Text (1 text = 1 Min)
 ** Not Available in California
 1 min voice = 1 text = 1/2 Mbps Data

MINUTE RATE, USAGE AND INCLUDED MONTHLY MINUTES

While you are enrolled in the ConnectToWireless Lifeline Program, you will receive a monthly allotment of minutes as provided for by the ConnectToWireless Lifeline Program with the additional Lifeline discount. To qualify for Lifeline programs you should meet Lifeline qualification requirements, complete required forms and provide required documentation. Please call our representative for details or by calling 1-888-738-7777 or visit our web site <http://www.ConnectToWireless.com>

Refill or Add-on for Postpaid
 1 min voice = 1 text = 1/2 Mbps Data
 Combo Voice, or Text
 Combo Voice or Text
 Data 100
 Data 500

Refill Cost
 250 \$9.99
 500 \$18.99
 100 \$9.99
 500 \$59.99

ConnectTo WIRELESS

To Signup
 Call 1-888-738-7777
 Email: sales@ConnectToWireless.com
 Or Visit <http://www.ConnectToWireless.com>

ConnectTo WIRELESS

Enrolling Lifeline Customers

- Eligibility Confirmation:

1. Confirm prospect's identity (see government issued picture ID)
2. Confirm program or income eligibility (see proof)
3. Confirm valid household address and whether permanent/temporary or multi-household (validate w/USPS)
4. Confirm prospect not currently receiving subsidy (ask prospect, perform duplicate check into an internal and pooled external database)
5. Confirm that eligible party has received the handset and has used it prior to seeking reimbursement

Enrolling Lifeline Customers

- End-User Education and Disclosures:
 - Lifeline is a federal non-transferable benefit
 - Lifeline service is available for only one line per household
 - A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
 - Households are NOT permitted to receive benefits from multiple providers
 - Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government





Recertifying Lifeline Customers

- Annual Recertification Compliance:
 - ConnectToWireless commits to re-certify the eligibility of all Lifeline and report the results to USAC. Because it has not launched, ConnectToWireless has no Lifeline customers as of June 1, 2012.
 - ConnectToWireless will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
 - All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
 - In addition, ConnectToWireless will continue to follow any state-specific requirements.



Preventing Waste, Fraud & Abuse

- ConnectToWireless utilizes a diligent Enrollment Process
- ConnectToWireless' business model primarily employs direct, in-person or over the phone/internet, high quality contact and customer service
- ConnectToWireless will not seek reimbursement until a customer has personally activated service (by initiation and/or usage)
- ConnectToWireless has a 60-day non-usage policy
- ConnectToWireless emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, employee training, process documentation, non-usage/de-enrollment procedures



Preventing Waste, Fraud & Abuse

- Additional Measures to prevent waste, fraud & abuse:
 - Duplicates Database
 - Pooled External Database (CGM, LLC)
 - National Database, when in place
 - Provide customer data to PUCs, FCC, and USAC
 - Independent Biennial Audits*
 - *if ConnectToWireless draws \$5 million+ on an annual basis



QUESTIONS?

